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CITY OF
FORT LAUDERDALE

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 25, 1993

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Subject: MM Docket No. 92-263

Dear Commissioners:

The City of Fort Lauderdale, Florida respectfully submits the enclosed Reply Comments in the Matter of Implementation of Section 8 of the Cable Television Consumer Protection and Competition Act of 1992 - Consumer Protection and Customer Service: MM Docket No. 92-263.

Thank you for the opportunity to provide our comments on this and other cable television related matters.

Sincerely,

Bruce A. Larkin, Director
Department of Administrative Services
City of Fort Lauderdale, Florida

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Implementation of Section 8 of the Cable
Television Consumer Protection and
Competition Act of 1992

Consumer Protection and Customer Service

MM Docket No. 92-263

To: The Commission

REPLY COMMENTS OF THE CITY OF FORT LAUDERDALE, FLORIDA

The City of Fort Lauderdale, Florida submits these reply comments in the above-captioned proceeding.

The City of Fort Lauderdale, Florida has reviewed the comments submitted by the National Association of Telecommunications Officers and Advisors, National League of Cities, United States Conference of Mayors, and the National Association of Counties ("Local Governments") submitted in this proceeding. The City of Fort Lauderdale, Florida believes that the comments filed by Local Governments accurately reflect the City of Fort Lauderdale's position on the implementation of Section 8 of the Cable Television Consumer Protection and Competition Act of 1992. Accordingly, the City of Fort Lauderdale, Florida concurs with the comments filed by Local Governments and respectfully requests the Commission to consider carefully these comments.

The City of Fort Lauderdale, Florida believes that the Commission should adopt a set of specific standards which will ensure adequate customer service throughout the country. The Commission-established standards should be self-executing and should apply to all cable systems as of the date of adoption of the standards by the FCC, without any further action to be taken by franchising authorities.

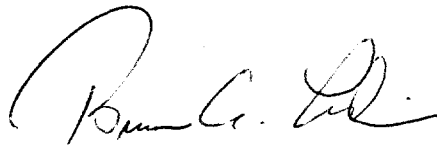
The Commission-established standards should apply to all cable operators with three exceptions: 1) where a franchising authority determines to waive one or more of the FCC standards in favor of less stringent standards; 2) where the franchising authority has more stringent customer service standards already in place; or 3) where a franchising authority exercises its right to promulgate more stringent standards or standards not addressed by the FCC standards.

Franchising authorities should be primarily responsible for enforcing the Commission-established standards. The Commission, if necessary, could act as a final arbiter of disputes between franchising authorities and cable operators.

The City of Fort Lauderdale, Florida believes that the Commission should establish comprehensive consumer protection rules, and urges the Commission not to adopt the National Cable Television Association (NCTA) standards because they are neither stringent nor specific enough and they do not address issues such as credits for a failure by the cable operator to keep a service call and credits for a failure by a cable operator to correct an outage or other reception problem promptly.

The City of Fort Lauderdale, Florida believes that the approach proposed by Local Governments, as filed in their comments, will ensure adequate customer service for cable customers in Fort Lauderdale as well as throughout the country, and will not unreasonably burden cable operators.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Bruce A. Larkin". The signature is fluid and cursive, with the first name "Bruce" being the most prominent.

Bruce A. Larkin, Director
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City of Fort Lauderdale, Florida
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